

October 22, 1990

Mr. William K. Reilly, Administrator  
Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460

Dear Mr. Reilly:

I have been informed by the Environmental Defense Fund of the effort by Ethyl Corporation to have the gasoline additive "HiTec 3000" approved.

The information issued by the EDF on this product, and the potential hazards it could cause, is very alarming to say the least.

Please consider these points:

- 1) Can we really afford to allow yet another chemical to be released into our breathing air and atmosphere?

\*\*\*\*\* NO!!! \*\*\*\*\*

- 2) Do we want to send a message to industries to pursue research and development for enhancing gasoline for automobiles rather than pursuing development of non-gasoline automobiles?

\*\*\*\*\* NO!!! \*\*\*\*\*

- 3) Do the benefits of this product outweigh the possible (but surely inevitable) damage it will do to humans and our air?

\*\*\*\*\* NO!!! \*\*\*\*\*

I urge you not to approve the Ethyl Corporation's application for "HiTec 3000".

Sincerely,

*Katy Glass*  
Katy Glass  
(EDF Member)

cc: Mr. Fred Krupp, Executive Director  
Environmental Defense Fund

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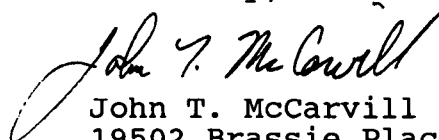
Administrator William K. Reilly  
Environmental Protection Agency  
401 M Street. S.W.  
Washington, D.C. 20460

October 24, 1990

Mr. Reilly,

I am writing this letter to urge you to reject Eythl Corporation's proposal of introducing "HiTec 3000" as a gasoline additive. As a member of the Environmental Defense Fund, a Genetic Toxicologist and a citizen of the United States, I find Eythl Corporations proposal of introducing toxic manganese into the environment distressing especially now when both individuals as well as corporations need to consider environmental concerns above all others, particularly monetary gains. Now, we have the opportunity to stop a mistake before it happens, unlike the addition of lead to gasoline of which we are now spending millions of dollars in clean-up efforts.

Sincerely,



John T. McCarvill  
19502 Brassie Place  
Gaithersburg, Md. 20879

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10/19/90

William K. Reilly  
EPA

401 M ST, SW

Washington, D.C. 20460

Dear Mr. Reilly:

I urge you to deny the Ethyl Corp. application for Hi-Tec 3000 gasoline additive. This product contains heavy metal manganese which should not be added to the environment. Long term chronic, low-dose effects of human exposure are not known, and the population should not be used as test subjects. Contamination of the environment by manganese will occur in many places and will not be easily reversed. Let's learn from the past (i.e. lead contamination) and not repeat our mistakes.

Thank you

SH: 11

William A. Hand



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20 October 1990

Environmental Protection Agency  
Attn: Administrator, Mr. William K. Reilly  
401 M Street, SW  
Washington, DC 20460

Dear Mr. Reilly:

It has been called to my attention that the Ethyl Corporation of America has requested approval of a gasoline additive called "HiTec 3000." It is my understanding that this additive would release large amounts of manganese into our environment.

I urge you to disapprove this additive! It has taken many years to limit the harmful effects of lead additives to gasoline. The last thing we need to do at this time of increased public awareness and concern is to introduce a new source of pollution.

I hope your agency will live up to its name and protect our environment from additional pollution.

Thanks in advance for your support.

Sincerely,



K. L. Dendinger

132 Kings Chapel Road  
Augusta, GA 30907

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38079

90OCT 29 P10:13



David Makulec  
854 West 181st Street  
Apartment #5A  
New York, New York 10033  
(212) 781-3097

Administrator William K. Reilly  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

October 24, 1990

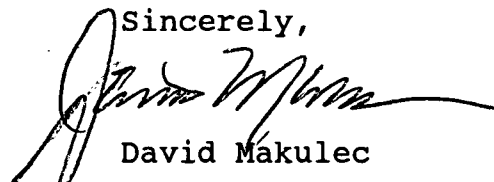
Administrator Reilly:

I am a member of the Environmental Defense Fund and an individual concerned that business and government will once again fail to protect the public from exposure to hazardous exhaust emissions.

Ethyl Corporation has applied to your agency for approval of a gasoline additive called "HiTec 3000," which contains manganese-- a toxic chemical whose high-dose risks are well-documented and whose long-term low-dose risks have been inadequately researched. To approve this additive will subject our population to unknown risks that will be costly to cure years later, a situation our experience with Ethyl's promotion of leaded gasoline not so long ago makes all too familiar.

The purported reductions in tailpipe emissions that might be achieved with this additive are small by comparison to the risks undertaken in the process. There are so many ways to reduce emissions and increase fuel efficiency that do not require the addition of toxins to our air that it would be foolish to accede to Ethyl's request. Instead, your agency and the rest of the government and business sectors should devote time, money, and energy to pursuing safer alternatives with greater benefits.

I hope you will deny Ethyl's application to approve "HiTec 3000," and so avoid regretting a future filled with illness and expensive cleanup efforts. There are so many paths to follow--it would be thoughtless to pursue such a risky one for so little benefit.

Sincerely,  
  
David Makulec

18.88

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38118  
900CT 30 A2:38

Michael M. Davis  
50 Mendum Street  
Boston, MA, 02131

Oct. 18, 1990

William K. Reilly, Administrator  
Environmental Protection Agency  
Washington, DC, 20460

Dear Mr. Reilly:

I have recently become aware of a plan (of Ethyl Corp.) to introduce manganese into gasoline! After all the years it took to get the lead OUT, now they want to put another toxic heavy metal IN.

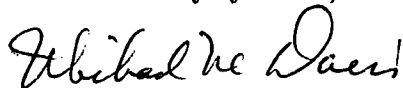
Lewis's Pharmacology, one of the best known texts on the subject, said about manganese as long ago as the 1970 edition, "Chronic poisoning may occur following prolonged inhalation of manganese dust ... The main symptoms are due to damage to the central nervous system and the liver ... " .

There MUST be a better way. This is certainly not it. Introducing known toxins into motor vehicle fuel residuals certainly is not sane, let alone a prudent approach to deal with the health of 250,000,000 people in this country.

If you have the results of epidemiological studies carried out over the past twenty years proving that manganese is harmless, I wish you would send references of those studies to me. Better, send me copies of the studies.

I request that you reject Ethyl's application to use MMT. (H. Tec 3000)

Sincerely yours,



Michael M. Davis

cc/ Environmental Defense Fund  
Sen. Edward Kennedy

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90OCT 24 AM: 11



EPA Administrator  
William K. Reilly  
401 Main Str. SW  
Washington D.C. 20460

10/22/90

SUBJECT: ETHYL CORP.

Dear Mr. Reilly

As owner of J.K.Engineering, a consulting Co. I'm well aware what impliments the driving force of large corporations. Unfortunately the environment or the people are respected as in this case. Ethyl Corp. is asking for the approval of HI TEC 3000. Please make shure this will be NOT allowed.

Yours truly,

A handwritten signature in black ink, appearing to read 'Jan Knabe', written in a cursive style.

Jan Knabe

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900CT 29 P10: 24

22 October, 1990

Shari Sirkin  
P.O. Box 80295  
Fairbanks, AK 99708

Administrator Reilly,

We know that manganese at high doses is a human neurotoxin, with serious effects on brain structure. HOW COULD THIS BE ENVIRONMENTALLY BENEFICIAL, as Ethyl Corporation suggests? And we don't know what a safe level of exposure is.

For these very simple reasons, I strongly urge you to reject Ethyl's application for HiTec 3000. It makes absolutely no sense to be using a potentially dangerous compound as a gasoline additive, even if it were to improve fuel efficiency.

There are so many non-toxic, non-polluting and inexpensive ways to reduce emissions and save gas/oil. Because of the extent of all the environmental problems associated with vehicles, the EPA should be in the forefront of efforts to reduce fuel consumption in the first place, by encouraging carpooling and the use of public, mass transportation, and specifically, focusing on R & D for appropriate technology!

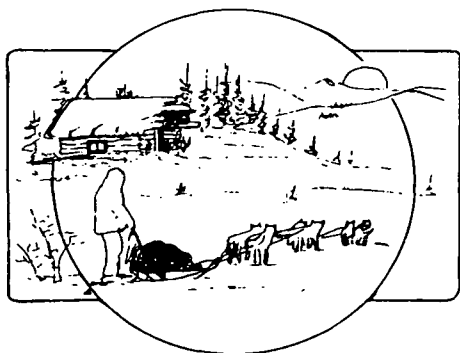
Using harmful chemicals and massive amounts of energy to produce a known poison with persistent and irreversible pathological effects on the brain just to add to gasoline so our big, heavy cars can get a little bit better gas mileage and possibly enable our cars to last a little bit longer is totally absurd. Particularly when there are alternatives.

As a concerned citizen, I ask you to please deny Ethyl's application for MMT.

Sincerely,

  
Shari Sirkin

# BROOKS RANGE



## WILDERNESS TRIPS

### DEPOSIT POLICY

A \$500.00 deposit is required with your application. Deposits will be refunded less a \$60.00 handling fee, if you cancel 90 days prior to the reservation date. After that, deposits will be refunded only if your space can be filled. You may also apply your deposit to a different date the same or following year. Full payment of the trip is due 30 days prior to your arrival.

### LIABILITY RELEASE

In consideration of, and as part of my payment for the right to take part in any services arranged, the undersigned, for himself and his heirs and assigns, hereby release Brooks Range Wilderness Trips and their employees from any liability for claims or lawsuits brought by the undersigned and arising out of the activities provided by Brooks Range Wilderness Trips.

I have read, understand and accept the terms and conditions stated herein and acknowledge that this agreement shall be effective and binding upon us during the entire period of participation in the activities.

Signature of trip participant:



## 1991 DOGSLED TRIPS

*February through April*

### Brooks Range Arctic Adventure (6 days) **\$1499**

Experience the thrill of driving a team of well-trained Alaskan huskies through pristine wilderness. Circumnavigate a small mountain range, travelling along frozen rivers and narrow trails. Snug wood-heated cabins each night. Superb home-cooked meals have become one of our trademarks. Trip covers 80 beautiful miles. Most experienced year-round local guides.

### Challenge of the North Expedition (7 days) **\$1799**

A thrilling adventure for those who have had some dog driving experience. You'll drive a team deep into the Brooks Range, sometimes breaking trail to explore new country. Most nights we'll be making camp in heated wall tents under thousands of stars and the Northern Lights. Rugged and challenging, scenery unforgettable. The ultimate Arctic experience. Limited to two persons per trip.

### *April Trips*

### Arctic Divide Photo Adventure (5 days) **\$1375**

We'll fly you from Bettles to the Eskimo community of Anaktuvuk Pass where we will base in a small house. Each day we will travel into a different valley along the Continental/Arctic Divide. Spectacular mountains, all above treeline. Great home-cooked food and comfortable accommodations each night in the village. We will fly you back to Bettles the morning of day 6 where you can make connections to Fairbanks. A photographer's dream.

### Arctic Divide Expedition (7 days) **\$1925**

A challenging trip for the adventurous! Prior dog driving experience highly recommended. Breathtaking scenery and very long days. Lots of ice travel and expect some wind. Most nights we'll make our own camp and sleep in a heated tent. Our longest trip, covering 120 miles of rugged wilderness. Our journey ends in Bettles. Limited to one person. Don't miss this one!

*Expedition class sleeping bag, parka, down pants, boots, and mitts are provided for dogsled clients.*

*A variety of custom trips can be arranged.*



Call us at (907) 692-5312

## 1990 SUMMER TRIPS

*All trips below can be run on your groups dates between June 8 and September 8.*

**John River Float and Day Hike (8 days) \$1,150**  
Mountain scenery, good wildlife, great family trip, rafts or canoes.

**Killik River Arctic Wildlife Float (10 days) \$1,850**  
North slope, above treeline, very few people visit, abundant wildlife, good hiking, sand dunes, wolves. Rafts or Folbots.

**Arrigetch Peaks Hike and Float (10 days) \$1,325**  
Spectacular jagged peaks, glacier, tarns and pingoes, peaceful Alutna River raft, canoe or Folbot float.

**North Slope Rivers Exploration (10 days) \$1,825**  
Remote, seldom visited area, above treeline, caribou, grizzly, moose, falcons, wolves. Class 2 rapids, spectacular wilderness. Rafts.

**Upper Noatak River Float and Day Hike (10 days) \$1,900**  
Outstanding scenery and wildlife, Gates of the Arctic National Park, great fishing, above treeline, raft, canoe or Folbot.

**Gates of the Arctic Backpack (10 days) \$1,599**  
Several spectacular routes, dall sheep, canyons, popular backpack route but no trails. Can be combined with a float trip.

**Kobuk River Fishing Adventure (10 days) \$1,599**  
Beautiful spruce taiga forests, bear, moose, osprey, excellent fishing for several species, ends at a small Eskimo village, canoe, raft or Folbot.

*Many other trip possibilities including caribou migration photography, hot springs, basecamps on remote lakes, and a variety of float and backpack trips. Ask us about custom and family trips.*

**WE KNOW WHERE TO GET AWAY FROM THE CROWDS!**



## FROM LEAD TO MANGANESE IN CAR EXHAUSTS.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God". It took 50 years to realize the lethality of car exhausts loaded with tetraethyl lead. Finally, after a hard-fought battle, the Environmental Protection Agency, instigated and assisted by the Environmental Defense Fund, has succeeded in getting most of the lead removed from gasoline.

Now, in 1990, Ethyl comes bearing another gift. This time it is methycyclopentadienyl manganese tricarbonyl (MMT). Ethyl is asking EPA to approve this chemical monstrosity as an octane-enhancing gasoline additive. EPA's answer, of course, should be a flat "No", based on our continuing tragic experience with the lead additive.

Lead poisoning continues to be an epidemic in the U.S. Even after considerable reduction of lead in gasoline has been accomplished through prolonged litigation, we face the almost impossible problem of cleaning up the residues of lead fallout from playgrounds, backyards and roadsides throughout the country.

The parallels between Ethyl's recent proposal to use manganese and its earlier proposal to use lead are chilling. The sole justification for each additive is its effect in reducing emissions of hydrocarbons and nitrous oxides from car exhausts. Nothing was said in either case about deposition in surface dusts or the effects of exposure to humans. In both cases, Ethyl argued that the amount of the chemical to be added to gasoline would be negligible and the amount released to the environment would be insignificant.

In a well funded ad campaign, claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit the public's concern over pollutants in global and local air. Actually, the purported reductions would be small at best, and would be overwhelmed by the health costs of longtime exposure to manganese.

We do not know what the effect of manganese would be on humans exposed to light doses over long periods of time, never having made the massive human experiment. We do know that manganese in higher doses is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. And there are indications that manganese may selectively affect the fetus, the young, and the aged.

From our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use on human exposure. We know that the gradual contamination of the environment with manganese will not be readily reversed. We know that manganese will accumulate in urban dusts and soils with close human contact.

Based both upon what we know and what we should know - but don't, the Environmental Defense Fund is urging the Environmental Protection Agency to reject the Ethyl Corporation's new proposal and immediately to suspend all currently permitted use of manganese as a gasoline additive in the United States.

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This article is based on one by Dr. Ellen K. Silbergeld of the Environmental Defense Fund, 257 Park Avenue South, New York, N.Y., 10010.

MARIE DONNELLY  
139 Chestnut Street  
Montclair, N. J. 07042  
(201) 746-1042

Nov. 8, 1990

Mr. William K. Lilly  
EPA Administrator  
Washington DC 20460

Dear Mr. Lilly,

Please suspend all use of  
manganese as a gasoline additive and  
prohibit any future use of it as an  
additive in gasoline. Lets not learn  
too late about manganese and have  
to ban its use as we have had to  
do with lead. Reject Ethyl's application  
to use MMT. We need to fight for  
the future now!

Sincerely yours,  
Marie Donnelly

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90NOV 14 P12:48

November 8, 1990

William K. Reilly  
EPA Administrator  
Washington, D C 20460

Dear Mr. Reilly,

Bad enough to have been subjected to the lead in gasoline, but now the Ethyl Corporation would compound our pollution problem with manganese additives!

PLEASE, PLEASE do not approve Ethyl's application for use of MMT in gasoline!

Sincerely,

*Charmian Kulka*

Charmian Kulka  
7851 Brookside Ave.  
Sebastopol, CA 95472

14 15:21

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CORR. CONTROL  
40253  
90NOV 14 PM 12:51

NOV 14 1990

November 3, 1990

Mr. William K. Reilly  
Environmental Protection Agency  
Washington, DC 20460

Dear Mr. Reilly:

We are writing to you about our concern with the possible use of, methycyclopentadienyl manganese tricarbonyl (MMT) in gasoline as a octane-enhancing additive.

We know that the Ethyl Corporation has claimed that using MMT can reduce tailpipe emissions. These purported reductions, if any, are very small, and are overwhelmed by the health costs of any exposure to the manganese that this additive will cause.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We do not know what a "safe" level of manganese exposure is, particularly for the young and the aged, who may be at increased risk.

We feel that approving the widespread use of this manganese product would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition.

Please reject Ethyl's application to use MMT.

Very Sincerely Yours,

*Lorraine Bagan*  
*628 Robin Drive*  
*Santa Clara, CA 95050*

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40253  
90NOV 14 P12:51



William L Lelly  
Environmental Protection Agency  
401 M. Street - SW  
Washington D.C. 20460

I recently found out about  
Ethyl Corporations application to use  
a new product "Hi Tec 3000" in  
their gas. I strongly request  
that you deny this.

Sincerely,  
Julie Bibler  
3170 NE 27th  
Bend Ore  
97701

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EPA

CORR. CONTROL

40249

90NOV 14 P12:55

Sara Oaklander  
24 Coleman Rd.  
Arlington, MA 02174

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Sara Oaklander

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CORR. CONTROL

40320

90NOV 14 PM 2:45

Patricia Cameron Vitiello, LCSW

1303 RAMONA AVE. • SPRING VALLEY, CALIFORNIA 92077 (619) 698-3964 (213) 821-0508 LICENSE LE9356

November 5, 1990

Dear Mr. Reilly,

This letter is written to ask you to please reject Ethyl's application to use MMT as we do not know the possible longterm adverse effects.

Look at our experience with lead.  
Please do not endorse another such  
deadly decision.

Thank you.

Sincerely,

Patricia C. Vitiello

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90NOV 14 12:05

DR. DOROTHEA L. CAPPADONA

23 WATCH WAY

LLOYD NECK, NEW YORK 11743

November 7, 1990

William K. Reilly, EPA Administrator  
Washington, D.C. 20460

Dear Mr. Reilly:

I read, with extreme consternation, that the Ethyl Corporation is asking the EPA to approve the addition of methycyclopentadienyl manganese tricarbonyl (MMT) to gasoline as an additive to enhance octane. I urge you not to approve of this additive for the following reasons:

- 1.No data has been submitted on the long-term effects of of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.
- 2.The claim that manganese releases to the environment will be insignificant and toxic only at high doses, is false. Given the ever-increasing reliance on the automobile, and traffic congestion in virtually every urban and suburban area in the country, the build-up of any toxic substance requires an ever-decreasing amount of time to become toxic.
- 3.Purported reductions in tailpipe emissions will easily be offset by the increase of manganese in the atmosphere, etc. We still do not have an accurate estimate of the expected effects on public health from manganese exposure which emanate from tailpipe emissions.
- 4.There is no data which indicates the impacts of manganese additives on manganese levels in other parts of the environment.
- 5.At high dosages, manganese is a neurotoxin (to humans), with persistent and irreversible pathological effects on brain structure, resulting in severe impairments in movement and mental state. Manganese affects the fetus, the young, and the aged. Manganese can break DNA, and is probably a carcinogenic. We do not know the full effects of long-term, chronic, low-dose exposure to manganese on humans. Nor do we know what is a "safe" level of exposure.
- 6.We do know that the effects of gradual, cumulative accumulation of manganese will not be easily reversed.
- 7.After experiencing the dreadful effects of leaded gasoline, an additive whose use was approved without proper study, one must be wary of ill-thought-out proposals.

At this time, do not approve the use of MMT!!!

Thank you.

Yours truly,  
Dorothea L. Cappadona

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40182

90NOV 14 P12:18



30 October, 1990

MEMORANDUM TO: William K. Reilly  
EPA Administrator  
Washington, D.C. 20460

FROM: Clayton Lewis  
312 North Brighton  
Dallas, TX 75208

RE: Gasoline additive

This is to urge the ENVIRONMENTAL PROTECTION AGENCY to reject an application to use a manganese-based compound as a gasoline additive.

Because of our unhappy experience with lead in gasoline, we know a great deal about the likely effects of this manganese compound over a long period of time and such effects would not be reversed readily.

Therefore, I add my request to that of others that this application be denied.

XC: file

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90 NOV 14 P 2: 15



## LOYOLA LAW SCHOOL

November 7, 1990

William K. Reilly  
E. P. A. Administrator  
Washington, DC 20460

Dear Sir:

I write to urge you to reject the pending application of the Ethyl Corporation to use MMT as an additive to gasoline.

There is adequate information available concerning the potential dangers of this toxic metal compound, both as a carcinogen and otherwise, to raise serious doubts as to its being safe for human ingestion at any level. Furthermore, the parallel with environmental lead degradation - emanating in large measure from this same applicant, and involving a similar product - is chilling. Finally, scientific knowledge as to the long term, cumulative effects of this substance in the environment does not allay these fears; and the applicant makes no effort to rectify that problem, relying instead upon unsubstantiated claims similar to its 1925 lead additive ones. This gambling with the health of future generations must be stopped.

Sincerely,

Curt Garbesi  
Professor of Law

CG:cmh

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40194

90NOV 14 12:13

*Humanistic Growth Center of Brevard*

1007 Palmetto Avenue  
Melbourne, Florida 32901  
(407) 727-7090

*Nov 9, 1990*

*E.P.A. Administrator*

*William K. Reilly*

*Wash. D.C.*

*Dear Sir:*

*I urge you to reject Ethyl's  
application to use MMT.*

*Sincerely, Yours,  
Marcelene M. Thompson*

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EPA

CORR. CONTROL

40209

90NOV 14 PM 12:08

Maria Roche  
1919 S. Ashland  
Chicago, IL 60608

William K. Reilly  
EPA Administrator  
Washington, DC 20406

Dear Mr. Reilly,

As a member of the Environmental Defense Fund, I have recently come to know of Ethyl's application to use MMT. I have also become informed of the dangers of accepting this application. My greatest fear is that there is not enough data amassed as of yet in order to make a sound decision. Secondly, I am concerned that the information we do have about manganese indicates that to use it on a wide-spread level would endanger the lives of many Americans unnecessarily. Manganese at high dose has pathological effects on brain structure and results in severe impairments in movement and mental state. Manganese may also selectively effect the fetus, the young and the aged. We do not know the long-term chronic, low-dose effects of human exposure to manganese. We do not know what a safe level of manganese exposure is, and we do not know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate a cancer causing potential.

I sincerely urge you to reject the Ethyl application on the grounds that there is not enough scientific information available as of yet to conclude it's safety and that the information that does exist indicates that it is better left out of our country's gasoline.

Sincerely,

*Maria Helen Roche*  
Maria Helen Roche

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402-11  
90NOV 14 12:07



11/1/90

Wendi Mirabella  
117 S. Gardner  
Los Angeles, CA 90036

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Wendi Mirabella

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CORR. CONTROL

40176

90 NOV 14 PM 12:05

Scott Gelb  
2521 Beverly Ave. #5  
Santa Monica, CA 90405

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

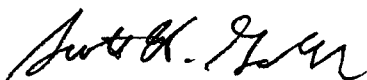
Dear Mr. Reilly,

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Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Scott Gelb

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EPA  
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40175  
90NOV 14 P12:01

Misty Carey  
400 S. Beverly Dr. #214  
Beverly Hills, CA 90212

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

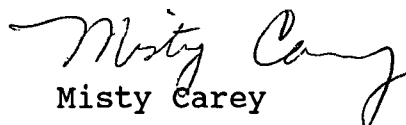
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

  
Misty Carey

RECEIVED

EPA

CORR. CONTROL

40174

90NOV 14 PM 2:14

Candace Haskell  
4040 Grand View #71  
Los Angeles, CA 90066

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Candace Haskell

RECEIVED  
EPA  
CORR. CONTROL

40173  
90NOV 14 P12:18



Joanna Tkaczyk  
525 S. Ardmore Ave. #150  
Los Angeles, CA 90020

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

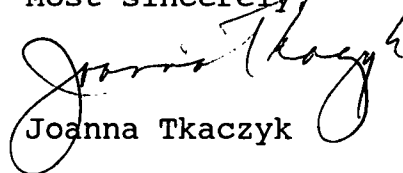
Dear Mr. Reilly,

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely

  
Joanna Tkaczyk

RECEIVED

EPA

CORR. CONTROL

40177  
90NOV 14 P12:09

DAVID DICHNER

*Certified Public Accountant*

2850 OCEAN PARK BOULEVARD, #292  
SANTA MONICA, CALIFORNIA 90405-5216

(213) 450-8588

FAX (213) 392-9392

November 8, 1990

Mr. William K. Reilly  
Environmental Protection Agency  
Washington, D.C. 20460

Re: MMT

Dear Mr. Reilly:

Better safe than sorry. Reject the application for the use of MMT.

Sincerely,



David Dichner

DD:bb

RECEIVED

EPA

CORR. CONTROL

42178

90NOV 14 PM 2:21

## EDF and Cancer Researchers Join to Save the Pacific Yew

**P**rominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (*Taxus brevifolia*) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



*Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.*

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living resources within them," said Manheim. "If we do not, we will have squandered a rich storehouse of natural products that, like taxol, may have enormous medical value."

## Task Force to Study Fast-Food Trash

*Continued from page 1.*

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

### Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"

—*The Wall Street Journal*

"...may break ground in the fight to protect the environment."

—*The Boston Globe*

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste-producers and one of its most likely targets, the giant McDonald's fast-food chain."

*The Tribune, Oakland, California*

"One welcome side effect of the plan is McDonald's decision not to build incinerators at its restaurants to burn wastes."

—*Star Tribune, Minneapolis-St. Paul*

### ENVIRONMENTAL DEFENSE FUND

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Watch for "EARTH TO KIDS:  
A Guide to Products for a  
Healthy Planet," this  
December on HBO. Produced  
by Consumer Reports Television  
in association with EDF.

PEEL OFF FOR ORDER FORM INSIDE  
04931916 AWL005  
MR DAVID DICHNER  
2601 OCEAN PARK BLVD #120  
SANTA MONICA CA 90405

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**EDF** Letter

# A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

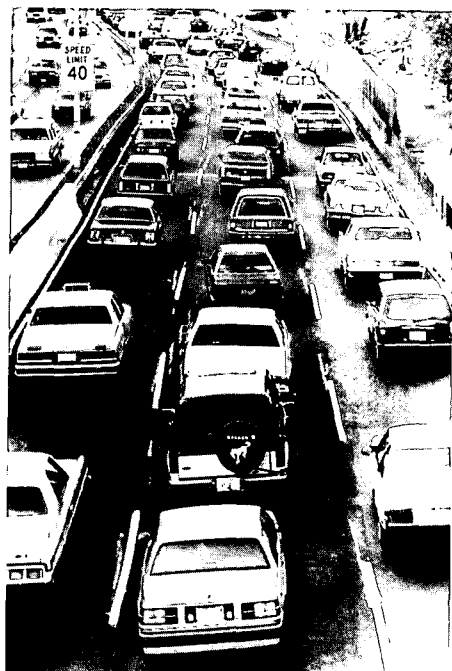
Lead poisoning is an epidemic in the U.S. Even after considerable reductions

**Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.**

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Condyles/Impact Visuals

*With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.*

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

**Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.**

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

## EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

Deborah Bellini  
2322 5th St. #201  
Santa Monica, CA 90405

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

23 1990

OCKET

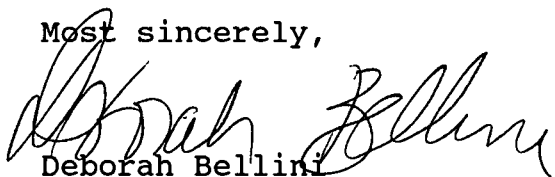
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

  
Deborah Bellini

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EPA

CORR. CONTROL

39682

90NOV 8 P1:14



618 W. Brockett  
Sherman TX 75090  
November 3, 1990

Mr. William K. Reilly  
Administrator  
Environmental Protection Agency  
Washington DC 20460

Dear Mr. Reilly:

Please say no to Ethyl Corporation's request for approval of MMT as a gasoline additive. We cannot afford to repeat the disaster of lead in the environment by emitting another toxic metal whose long-term effects are unknown ~~by~~ but rather predictable. There are other ways to reduce automobile emissions not the least of which is to reduce miles driven by developing mass transit alternatives.

Thank you for consideration of this letter.

Sincerely yours,  
Cynthia Manley  
(an EDF member)

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EPA

CORR. CONTROL

39681

90NOV 8 P 1:14

P.59  
WILLIAM K. REILLY  
ADMINISTRATOR  
U.S.E.P.A.

Mr. Mr. Reilly -

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "Hi-Tec 3000", a TOXIC MANGANESE-BASED gasoline additive. Our atmosphere is in bad enough shape as it is. and, we still don't have a cure for cancer!

Thank you very much!

Robert J. Porter

ROBERT J. PORTER

RECEIVED

EPA

CORR. CONTROL

39680

90NOV 8 P1:14



**American Massage Therapy Association, Incorporated**

**Paul D. Tuff**

Sports Massage Therapist

Registered Massage Therapist

P.O. Box 1218

Carmel Valley, CA 93924

(408) 659-3188

Dear Mr. Kelly

I strongly urge you to REJECT the Ethyl Corporation's application to use MMT as an octane-enhancing gasoline additive. We cannot afford to repeat the public health catastrophe associated with the use of lead as a gasoline additive. Please suspend all currently permitted use of manganese as a gasoline additive in the United States.

Sincerely

Paul D Tuff

RECEIVED

EPA

CORR. CONTROL

39684

90NOV 8 1:13

November 3, 1990

Dear Mr. Reilly,

I'm writing to urge you to deny the addition of MMT to gasoline. The research data on manganese is relatively sparse. With the already existing atmospheric problems it would seem wise to move slowly and carefully before randomly introducing another element into our environment.

Sincerely,  
Robin Lillyreed  
47 Bayview Ave  
Port Washington, N.Y.

11050

P.S. Please set your sights more upon supporting an appropriate hydrogen fuel.

RECEIVED

EPA  
CORR. CONTROL

39644

90NOV 8 P1:17



11-7-90

Dear Mr. Reilly

Please support the use of Hi TEC 3000 additive to gasoline. As a concerned citizen it is apparent that major improvements in air quality can be achieved with this product.

Charles A. Buelo  
President Buelo Inc

RECEIVED

EPA

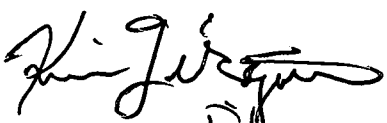
CORR. CONTROL

39645

90NOV 8 P 1:17

11/4/90

To William K Reilly, please do not  
give the OK. to Ethyl, and companies like  
her to use mmt as a gasoline  
additive. Hasnt the harmful effects of  
metals in our environment been demonstrated  
enough! These metals do not go away,  
rather they accumulate beyond safe (??)  
guidelines.

Thanks,  
  
Kevin Fitzgerald

RECEIVED  
EPA  
CORR. CONTROL  
39651  
90NOV 8 P1:16

11-5-90

Dear Mr. Reilly,

I realize this is probably a futile effort, based on the EPA's reputation and record so far, but I urge you to reject Ethyl Corporation's application to use methycyclopentadienyl manganese tricarbonyl (MMT). Their gift to us of leaded gasoline also claimed that the health & environmental effects would be negligible. There are many parallels between lead and MMT.

Please **REJECT** this application. Just  
Say no — for our health, for our  
environment.

Thanks.

Sincerely,

Naomi Durant

5342 W. 102 St.

Overland Park, KS 66207

RECEIVED

EPA

CORR. CONTROL

39657

90NOV 8 P1:16

**JANET MOUNTJOY**

*237 Echo Lane, Portola Valley, California 94028*

November 2, 1990

William K. Reilly  
Administrator  
Environmental Protection Agency  
Washington, D.C. 20460

Dear Mr. Reilly,

It has come to my attention that the Ethyl Corporation has requested permission to use Manganese as an octane booster to gasoline. I urge you to reject this petition because there is insufficient data on health and safety effects of massive amounts of this mineral entering our air and accumulating in our environment to be certain that its addition to gasoline will not cause a disaster similar to that caused by the use of lead as an additive to gasoline.

The claim that the use of manganese can reduce the emissions of hydrocarbons and nitrous oxides from cars is not a sufficient reason to overlook the potential of its disastrous effects on health.

Sincerely yours,

A handwritten signature in cursive script, reading "Janet Mountjoy". The signature is fluid and stylized, with the first and last letters of the first and last names being capitalized and prominent.

Janet R. Mountjoy

RECEIVED  
EPA  
CORR. CONTROL  
39660  
90NOV 8 P1:15



October 23, 1990

William K. Reilly-Administrator  
Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

Dear Mr. Reilly:

As a concerned citizen for the safety of our environment, I strongly urge you to deny the Ethyl Corporation's application for "HiTech 3000," a toxic manganese-based gasoline additive I believe needs further testing before it is released into the environment .

Sincerely,

*Jennifer Wall*

RECEIVED

EPA

CORR. CONTROL

39661

90NOV 8 P1:15

LUCIUS T. HILL, M.D., F.A.C.S.  
GENERAL SURGERY

9 Buzell Avenue • PO Box 433 • Exeter, New Hampshire 03833  
603 772-4791

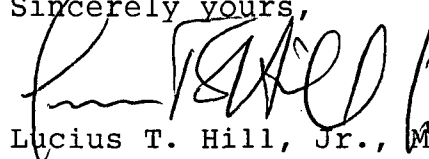
October 29, 1990

William K. Reilly  
Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

The EPA has the potential to prevent Ethyl Corporation of America from adding Hi Tec 3,000 to gasoline in this country. This product contains manganese, a toxic heavy metal, and it is critical that the EPA prevent this additive from becoming widespread in this country. We strongly advise you to prevent the use of this material.

Sincerely yours,



Lucius T. Hill, Jr., M.D.

LTH/shl

RECEIVED  
EPA  
CORR. CONTROL  
39669  
90NOV 8 P1:15

Charles R. Holman  
Rt 1 Box 154H  
Indian Head, MD 20640  
October 16, 1990

Administrator William K. Reilly  
Environmental Protection Agency  
401 M Street, S.W.  
Washington, DC 20460

Dear Mr. Reilly:

I am one of many citizens who is concerned about the "greenhouse effect" caused in part by the world's automobiles - the United States among the chief offenders. I understand that the Ethyl Corporation has developed an additive that reduces pollutants and increases mileage. Tests conducted on Hitec 3000 have conclusively indicated EPA approved usage would be a positive step forward in conquering some of the environmental problems we are experiencing.

I strongly urge that your agency approve the use of Hitec 3000.

Sincerely,

*Charles R. Holman*  
Charles R. Holman

RECEIVED  
EPA  
CORR. CONTROL  
*36278*  
900CT19 P3:39

ROBERT E. BOGARD  
66 MADISON AVE. #3B  
NEW YORK, NY 10016

ADMINISTRATOR WILLIAM K. REILLY  
Environmental Protection Agency  
401 M. Street, SW  
Washington, DC 20460

Dear Mr. Reilly:

I am writing to express my concern about the proposed application for "HiTec 3000" by the Ethyl Corporation. As I am sure you are aware, this product contains manganese, a toxic heavy metal which would be released into the atmosphere should this product become approved.

The Ethyl corporation is citing certain bits of data that seem to indicate that the use of methycyclopentadienyl manganese tricarbonyl (MMT) will not increase airborne manganese concentration over cities. They are ignoring contrary evidence to this, and apparently have almost accomplished their goal of having the EPA approve their application. The fact remains that there have not been sufficient studies to support Ethyl's claims, and it would be extremely unwise to authorize the release of even more pollution into our environment, especially now in the light of the new clean air legislation in Congress. Since we are about to try to mend the ravages of our past heavy use of gasoline, it is unthinkable that we are considering encouraging even more health-hazardous materials to be introduced into this substance.

I strongly urge you to reject Ethyl's application and suspend all currently permitted use of manganese as a gasoline additive in the United States.

Sincerely,



Robert E. Bogard

RECEIVED

EPA

CORR. CONTROL

3852

90 OCT 30 A 3:21



TOWN OF WELLESLEY



MASSACHUSETTS

**NATURAL RESOURCES COMMISSION**  
TOWN HALL, WELLESLEY, MA 02181

WETLANDS PROTECTION COMMITTEE  
LANDSCAPE ADVISORY COMMITTEE  
LONG RANGE PLANNING COMMITTEE

JUDITH A. NICOLSON  
DIRECTOR  
TELEPHONE: (617) 431-1019 x294

October 26, 1990

William K. Reilly  
EPA Administrator  
U.S. Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460

Subject: Ethyl Corp. application to use manganese compound as  
additive in gasoline

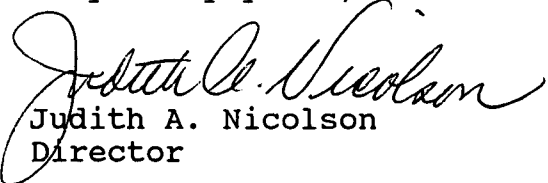
Dear Mr. Reilly:

Just say NO! It would be folly beyond comprehension to  
subject the citizens of this country to an experiment in mass  
poisoning when we have the history of lead additives unmistakably  
before us.

There really isn't anything else to say - just DON'T!

Thank you for listening and acting.

Very truly yours,

  
Judith A. Nicolson  
Director

cc: nrc

RECEIVED  
EPA  
CORR. CONTROL  
38159  
900CT 30 A4:21

T. Britt Griswold  
3807 Foxfield Lane  
Fairfax, VA 22033-1303  
(703) 830-7571

William K. Reilly  
Environmental Protection Agency  
Washington, DC 20460

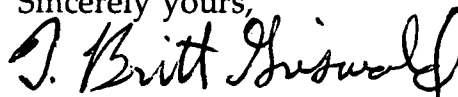
Dear Mr. Reilly,

I urge you to reject the Ethyl Corporation's application to create and market a manganese additive (MMT) for gasoline. Without the same kind of indepth studies which proved lead additives to be a tragic burden on our society, common sense says that a metallic substance that exhibits similar characteristics to lead in high doses is probably going to cause similar problems as lead in low doses.

The burden of proof should be squarely on Ethyl's shoulders to prove beyond the standard of testing established by lead that MMT is safe. I do not believe they have done that.

Do not let the madness of a company solely interested in profit poison us and our children.

Sincerely yours,



T. Britt Griswold

10/22/90

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EPA

CORR. CONTROL

37979

90OCT 26 P 3:41

ENVIRONMENTAL  
PROTECTION AGENCY  
MR. WILLIAM K. REILLY,  
ADMINISTRATOR,  
401 "M" STREET, S.W.  
WASHINGTON, D.C.  
20460

DEAR MR. REILLY,

I BELIEVE YOU ARE FAMILIAR WITH THE ARTICLES  
AND THE IMPLICATIONS OF THIS BASED FUEL.  
PLEASE BE POSITIVE ON YOUR DECISIONS.  
POSITIVE THAT YOU REPRESENT THE AGENCY THAT  
IS "TO PROTECT THE ENVIRONMENT." POSITIVE THAT  
YOU AND YOUR FAMILY ARE JUST AS AFFECTED BY ALL  
OF US IN THE LONG RUN OF TIME. AND POSITIVE  
THAT THE OIL WEALTH ISN'T GOING TO BE THE  
ULTIMATE POWER - IN THIS WORLD.

PLEASE BE POSITIVE TO MY REQUEST BECAUSE I  
CAN BE A REPRESENTATION OF THOUSANDS OF OTHERS  
WHOM IN ONE WAY OR ANOTHER - CAN NOT SPEAK FOR  
THEMSELVES TO SAY "SAVE OUR WORLD".

THANK YOU FOR YOUR KIND ATTENTION.

Norma Chew -  
1812 N. COMMONWEALTH AV.  
LOS ANGELES, CA 90027.

# A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

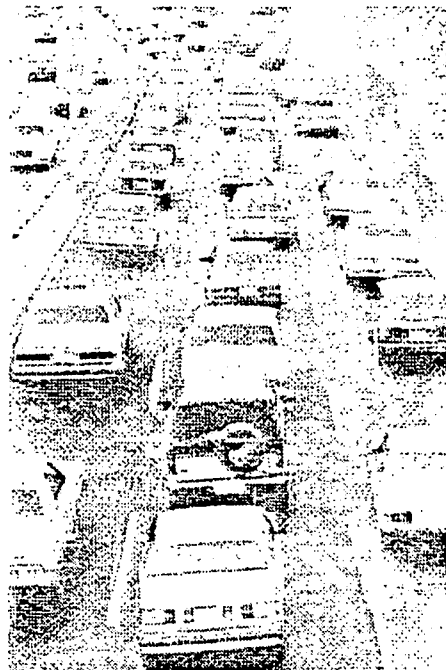
Lead poisoning is an epidemic in the U.S. Even after considerable reductions

*Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.*

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



*With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.*

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

*Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.*

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

## EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

Kirk Condyles/Impact Visuals

C. Jeffrey + Teresa W. Stump  
101 Park Street  
Christiansburg, Virginia 24023

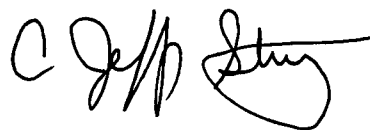
October 24, 1990

Administrator William K. Reilly  
Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460

Dear Administrator Reilly:

As active environmentalists, we strongly urge you to deny Ethyl Corporation's application for "HiTec 3000". Our environment does not need another toxic gasoline additive like manganese.

Very truly yours,



Teresa W. Stump

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EPA

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37891

90 OCT 26 P 2:27



*Law Offices*

*Christopher A. Hudson*

*P.O. Box 33877*

*Charlotte, North Carolina 28238*

*Telephone (704) 382-4669*

October 24, 1990

The Honorable William K. Reilly, Administrator  
Environmental Protection Agency  
Washington, DC 20460

RE: Ethyl Corporation Manganese Additive Application

Dear Mr. Reilly:

Please reject the application of Ethyl Corporation to add MMT to gasoline as an octane enhancer. There is clearly too great a risk that the serious health hazards of lead in gasoline will be duplicated with as widespread use of manganese in fuels as contemplated. Because the lead parallel is quite compelling and because we have such extensive experience with lead, please, at a minimum, require large-scale studies of health effects prior to any approval of such additive for widespread use.

Thank you for your attention to my comments.

Very truly yours,



Christopher A. Hudson

CAH:bs

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October 23, 1990

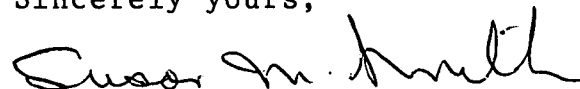
Mr. William K. Reilly, Administrator  
EPA,  
Washington, DC 20460

Re: Manganese as an additive to gasoline.

Dear Mr. Reilly:

I believe that the Environmental Defense Fund is right.  
The use of manganese is a most unwise proposal by the Ethyl Co.  
I urge you to deny this application for use.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Susan M. Smith".

Susan M. Smith

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90OCT 26 P 2: 31

606 Hillcrest Drive  
Fairborn, Ohio 45324  
October 24, 1990

Administrator William K. Reilly  
Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

Dear Sir,

My purpose for writing this letter is to ask you to reject Ethyl Corporation's application to use MMT as an octane-enhancing gasoline additive. I am concerned that, by putting another heavy metal additive into gasoline (namely, manganese), our environment may be exposed to a new health hazard and future unknown clean-up costs. This additive should not be approved for use if we do not know what the long-term chronic low-dose effects of human exposure to manganese are and what a safe level of manganese exposure is.

Sincerely,

Rita Q. Lethert

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90OCT 26 P2. H2

Mr Wm. K. Reilly  
 Administrator of E. P. D.  
 Washington D.C. 20460

Dear Sir;

I urge you to reject the application of the Ethyl Corporation to use mmt as a gasoline additive.

This will surely cause harm to the environment, look at the example of leaded gas and this has not been studied enough to warrant its use.

Please please think of the children coming along. before you jump into a new idea that has not been proven.

Thank you

Mary F. Flonders  
 P.O. Box 872  
 Alpine TX  
 79831

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90OCT26 P2:49



IRWIN LEFF  
178 - 27th Avenue  
San Francisco, CA 94121

October 23, 1990

William K. Reilly, Administrator  
Environmental Protection Agency  
401 M Street, S.W.  
Washington, DC 20460

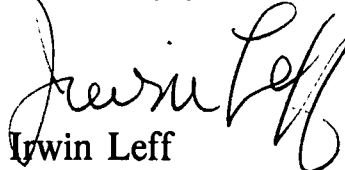
Re: Ethyl Corporation application for approval of HiTec 3000

Dear Mr. Reilly:

I was shocked to learn that Ethyl Corporation has applied to the EPA for approval of the use of a new gasoline additive called "HiTec 3000." I urge you not to approve the use of this latest attempt to poison the air that we breath -- this time with manganese rather than lead. The Ethyl Corporation has profitted over the years through its sale of the lead additive, and we have all been forced to pay the price in human life and money to rectify their action. They have the burden of showing that their latest effort will not lead to the same result, and this they have not done and cannot do. Too little is known about the long term effect of breathing in manganese, and we should not take the chance that we would be inviting a new environmental disaster.

You owe it to the American people to stop the use of HiTec 3000 until its safety has been clearly and definitively proven.

Very truly yours,

  
Irwin Leff

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90OCT 26 P2: R2

October 22,1990

William K. Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly:

This is to urge you strongly to deny the application of the Ethyl Corporation to market the product known as HI-TEC 3000, an additive manufactured from a manganese base. No history exists to assure us that the releasing of manganese into the environment in large quantities would not be poisonous to humans, other animals and plants.

I'm a parent, a grandparent, a family therapist, an author of children's books and an environmentalist. You are the administrator of what is supposed to be the agency that protects our earth, air and water. I realize that, in your position, you may be experiencing a conflict of values: the quality of our life-support system vs. the business of money-making in the corporate sector. Added to your burden, there may also be the factor of political obligation.

Even so, there is only one right thing to do.

Sincerely yours,



Joyce Maxner  
269 Greenbriar Court  
Newtown Square, Pa. 19073

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